

August 1, 2005

Ms. Sally Shipman
U.S. Department of State
EB/CIP, Room 2529
2201 C Street, NW
Washington, DC 20520

Dear Ms. Shipman:

The Corporation for National Research Initiatives (CNRI) is pleased to provide comments on the "Report of the Working Group on Internet Governance" which was recently issued by the Working Group on Internet Governance (WGIG). I understand that there was also a background report prepared; however, when I use the term Report, I mean the formal Report of the Working Group and not the background report.

1. An important omission in the Report is any reference to the history of the Internet going back to its formative years in the early 1970s. The Report simply states "During the 10 years in which the Internet evolved from a research and academic facility into 'a global facility available to the public'" The Report provides no reference to the relevant history prior to the Internet becoming operational in 1983, or to its developmental phase from 1983 to 1993.

2. The Report focuses for the most part on the Domain Name System (DNS) in the context of Internet Governance, but other relevant aspects of the subject are not addressed, such as the evolution of technology to manage information in the Internet environment. The DNS is really just an early first cut at infrastructure in this context, and there are other methods that lend themselves more readily to the identification and structuring of information. For example, for many years, the publishing industry has relied on the use of a system based on digital object identifiers (DOIs) to manage their information via the net. (for information about this system, see www.doi.org or www.crossref.org).

3. The Report does not address the issue of a definition of the Internet, but simply notes that there is a "common understanding" of what the term means. During the WGIG consultations, CNRI submitted comments in which it noted the definition of Internet adopted by the U.S. Federal Networking Council in 1995. In addition to the notion of layering, and end-to-end, which were early architectural choices, CNRI proposed the introduction of an important phrase (i.e., "or integrated with") to the FNC definition to accommodate the evolving nature of technology in the Internet. These comments may be obtained at the www.wgig.org site.

4. On page 8, the Report mentions briefly "next generation networks" (NGNs), but does not explain how this fits into or would differ from the Internet going forward. This issue also arose at the WGIG meeting at Geneva last February. While we may have NGNs in the future, it was acknowledged that there would still be a need for "internetting" and thus

the need for the Internet to accommodate such new capabilities.

Bob Kahn
President & CEO
Corporation for National Research Initiatives